



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

March 1, 2013



Mr. Michael Berkoff
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SRF-6J)
Chicago, Illinois 60604-3507

Dear Mr. Berkoff:

SUBJECT: Comments on the Permanent Marker Specifications for the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site Operable Unit 2: Willow Boulevard/A-Site Landfill

The Michigan Department of Environmental Quality (MDEQ) has received (February 17, 2013) and reviewed the Permanent Marker Specifications for the Willow Boulevard/A-Site Landfill, Operable Unit 2 of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, prepared by ARCADIS on behalf of Georgia Pacific LLC. The MDEQ appreciates the opportunity to assist the United States Environmental Protection Agency (USEPA) by providing comments on the permanent marker specifications for the Willow Boulevard/A-Site Landfill.

The MDEQ finds the locations of the large and small permanent markers acceptable with the understanding that the location of the large permanent marker will be located at the site entry gate, once its final location is determined. Also, the specifications and site illustration (using the final as-built drawing illustration) for the large marker are acceptable.

The MDEQ recommends the following modifications be made to the language of the large and small markers and the specification for the small marker:

- The large permanent marker language should include additional language to identify that the property has been subject to environmental remediation under Federal and State law and that restrictive covenants on the property prohibit interference with the implemented remedy. The marker should also include a summary of the implemented remedy, summary of the prohibited uses and restrictions, the location that the restrictive covenant was filed (including the liber and page number), and any other pertinent information.
- The small permanent marker language should also include the statement that "Unauthorized Access is Prohibited."

- The small permanent marker should be of sufficient size and height to be visible during all months of the year. It seems unlikely that a ground level, flush mounted marker would be visible during the winter months and could become overgrown with vegetation.

The MDEQ recommends that the USEPA provide these comments to the potentially responsible parties to be incorporated into the permanent markers for the Willow Boulevard/A-Site Landfill site. The MDEQ looks forward to assisting the USEPA with this site in the future. If you have any questions regarding these comments, please contact me at the number below or at zakrzewskik@michigan.gov at your earliest convenience.

Sincerely,



Kristi Zakrzewski, P.E.
Project Manager
Site Assessment and Site Management Unit
Superfund Section
Remediation and Redevelopment Division
517-373-2937

cc: Mr. Jeff Keiser, CH2M Hill
Mr. Scott Hutsell, CH2M Hill
Mr. Garry Griffith, Georgia Pacific LLC
Mr. Patrick McGuire, ARCADIS
Ms. Daria W. Devantier, MDEQ
Ms. Judith Alfano, MDEQ